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June 22, 2021

VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Alvarado v. 58 West LLC d/b/a Loi Estiatorio et al.*
1:19-cv-07694-AT

Dear Judge Torres:

This firm represents the Defendants in the above-referenced action. The Defendants write jointly with Plaintiffs, pursuant to Paragraph I(C) of Your Honor's Individual Practices in Civil Cases, to respectfully request that the parties' deadline to request a pre-motion conference in advance of moving for summary judgment be extended sixty (60) days from Friday, June 25, through and including Tuesday, August 24, 2021.

There was a delay in receipt of the deposition transcripts. All deponents retained their right to review the deposition transcripts within thirty (30) days pursuant to FRCP 30(e). The Defendants and two non-party witnesses received their transcripts earlier this morning. In addition, since Plaintiffs just filed the Amended Complaint, the Defendants must file their answer or otherwise respond. *See* ECF Doc. 74 & 77. Lastly, the additional time would permit the opportunity for further discussions that may narrow issues in advance of summary judgment.


This is the first request to extend the summary judgment deadline. Thank you for Your Honor's time and consideration.

Respectfully submitted,
CLIFTON BUDD & DeMARIA, LLP
Attorneys for the Defendants

GRANTED. By **August 24, 2021**, the parties shall submit their pre-motion letters.

SO ORDERED.

Dated: June 23, 2021
New York, New York



ANALISA TORRES
United States District Judge